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Attorneys for Defendant  
National Consumer Telecom & Utilities Exchange, Inc.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JAMES MOLINARO,

Plaintiff,

v.

NATIONAL CONSUMER TELECOM &  
UTILITIES EXCHANGE, INC.,

Defendant.

Case No. 2:21-cv-01948-JCM-BNW

**AMENDED STIPULATION FOR  
EXTENSION OF TIME FOR  
NATIONAL CONSUMER  
TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE  
RESPONSE TO COMPLAINT**

**(SECOND REQUEST)**

Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff James Molinaro (“Plaintiff” or “Molinaro”), by and through his counsel of record, the law firm of Krieger Law Group, LLC, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on October 22, 2021;

WHEREAS, Defendant NCTUE’S deadline to respond to Plaintiff’s Complaint was December 20, 2021;

WHEREAS, due to settlement discussions between the parties that commenced on December 20, 2021, Plaintiff agreed that late that day that NCTUE may have an extension to respond to the Complaint to facilitate the parties’ efforts to resolve this matter without the need for further litigation;

1 WHEREAS, the parties were unable to coordinate the preparation, review, execution and  
2 filing of a stipulation to extend NCTUE's deadline to respond to Plaintiff's Complaint until  
3 December 22, 2022 as a result of the parties' schedules and efforts directed towards resolving this  
4 matter;

5 WHEREAS, the parties continue to engage in settlement discussions and have agreed that  
6 NCTUE may have until January 27, 2022 in which to respond to Plaintiff's Complaint.

7 WHEREAS, there are no other deadlines that are affected by this stipulation that are  
8 presently known to the parties; and

9 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

10 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up  
11 through January 27, 2022 in which to respond to Plaintiff's Complaint.

12  
13 Respectfully Submitted by:

14 **GREENE INFUSO, LLP**

15  
16 /s/ Michael V. Infuso  
17 Michael V. Infuso, Esq.  
18 Nevada Bar No. 7388  
19 Keith W. Barlow, Esq.  
20 Nevada Bar No. 12689  
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Approved by:

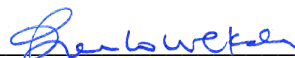
**KRIEGER LAW GROUP, LLC**

/s/ Shawn Miller, Esq.  
David Krieger, Esq.  
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2850 W. Horizon Ridge Pkwy  
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21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated this 21st day of January, 2022.

24  
25 

26 United States Magistrate Judge  
27  
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